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COMMENTS ON THE INSPECTOR GENERAL'S REPORT
ON POSITION MANAGEMENT AND COMPENSATION DIVISION/OP

The inspection team lists as one of its objectives the answering of the question: "Why are major customer-perceived needs for Office of Personnel services less than fully satisfied?" In the specific ~~discussion~~ discussion on PMCD the paper raises two major areas of customer dissatisfaction: 1) timeliness in updating component requested changes on staffing complements; and 2) grade allocations.

TIMELINESS - The paper states that Agency managers are dissatisfied with the time it takes PMCD to implement requested changes and reorganizations on the staffing complement. The paper appears to lay the blame for this primarily on the conduct of component surveys on a fixed schedule.

PMCD has likewise been concerned with the timeliness of staffing complement changes. However, PMCD perceived the problem differently believing that it was not given the manpower necessary to maintain a survey program (which it perceived as necessary) and a maintenance program to take care of all other component requests. PMCD has been given some additional manpower and it could also change its survey schedule and modify its survey methodology to reduce the time it takes to conduct a survey. But these changes in themselves will not necessarily speed up the process of responding to component requests of minor and major reorganizations on the staffing complement. The survey report alludes to the need for PMCD to be brought in at the initial stages of reorganization planning to provide assistance and guidance on position classification. Nowhere, however, was this mentioned in the report recommendations. As a rule rather than as an exception, PMCD is not consulted concerning a component reorganization until the reorganization has been completed.

Then, almost as an afterthought, a ^{memorandum} ~~request~~ is sent to PMCD in a brief format without any accompanying job information requesting ^S that the reorganization be "rubber stamped". A good case in point is the great volume of FI staffing complement revisions received by PMCD each Fall. PMCD is hit with revised staffing complements by most all Agency components at the same time and PMCD is asked to implement the changes as soon as possible usually ~~in~~ ^{days or less} within 30 ~~days~~. Never mind that no accompanying justification for the grade levels proposed is attached, the changes have to be implemented as soon as possible. There is no way to cope with a situation such as this but to either take enough time to get the information necessary for a competent position classification analysis, or "rubber Stamp" the component's request. Handling reorganizations on the staffing complement has to be a cooperative effort from the initial concept between the components and PMCD if undue delays are to be avoided. The report recommendations should have addressed themselves to this problem.

Grade Allocations - The paper questions the qualifications of the PMCD analysis to understand complex and often "unique" Agency position requirements with the result that grade allocations are often incorrect, at least as perceived by Agency managers. The I.G. report states that PMCD relies on CSC standards for much of its position classification guidance without realizing that Agency jobs are often "unique". While it is true that PMCS utilizes CSC standards for guidance as well as outside comparisons when applicable, the majority of grade allocations are made on the basis on internal comparisons between similar or like Agency positions. If the majority of positions were classified strictly by CSC a large bulk of Agency positions, especially at the clerical level would be found after a ^uthrough reading of the CSC standards to be overgraded by anywhere from one to three grades. As an example, the CSC standard for

for the Mail and File Series indicates that grades GS-03 and GS-04 are the norm for positions in that occupational specialty. Agency positions for registry clerks which are directly applicable in most respects with the CSC standard definition are graded anywhere from GS-05 to GS-07. Clearly this doesn't reflect adherence to the CSC Standard. *Re external comparisons the I.G. paper states: A NSA Computer Programmer is a job than a GS-12 Agency programmer. One hopes the I.G. recognizes that the converse of this statement may also be true.* Another statement made in the paper which appears to reflect on PMCD grade allocations is: "...we also question the infallability of PMCD's judgment."

What this statement appears to say is that there is an attitude in PMCD that it is always right. I can't believe anyone in PMCD was so brash as to suggest that PMCD is infallable. We, I'm sure, would be the first to recognize that there is no infallability in position classification. If there was there would certainly be no reason to create the new Factor Evaluation System. I don't believe any other office in the Agency goes to as much trouble as PMCD to ascertain that it has all the salient information needed to render an educated judgment.

The I.G. paper also makes frequent reference to managers who have indicated it is easy to "snow" PMCD into giving them what they want. PMCD does not dispute this statement at all. By necessity PMCD has to assume that the Agency managers and employees with whom it does business are inherently honest. If they are not then they can gain a short range advantage but they will have their own consciences to live with ~~and~~ not to mention ^{they contribute to a} further deterioration of the principle of equal pay for equal work. And one wonders if these managers find it so easy to "snow" PMCD, do they also extend this "snow" technique to their own superiors on up the line to get their way?

Probably the major obstacle between compatible relations between PMCD and the Agency managers is that we are both working at conflicting goals. PMCD perceives its goal as maintaining the equal pay for equal work principle

while not inhibiting the Agency's accomplishment of its intelligence mission. Agency managers on the other hand are totally mission orientated. As long as they can meet their collection, production or service missions, they are not interested in the equal pay for equal work principle (unless they perceive they are on the low end) and inversely they perceive they can get better employees and do more with ~~higher~~ higher grades. There probably are very few managers who wouldn't jump at a higher grade structure or a greater number of employees no matter that ~~they~~^{there} was no rational justification to support the increases. Government is not profit motivated so government managers are not motivated by reducing costs except by budgetary restraints. Shouldn't Agency managers and PMCD be working ~~at~~ a single common goal, that is accomplishing the Agency mission while minimizing to the extent practicable within the equal pay principle the costs of personnel resources necessary to accomplish this mission. Until both are working toward a common goal the adversary relationship cannot be abated.

The I.G. paper makes one other statement, ~~two points of which~~ ^{in the narrative discourse portion of the} I maintained ~~paper~~ ^{is} ~~is~~ open for debate. "No effective system of enforcement or appeal has been ~~for~~ formalized to deal with outstanding differences, and various mechanisms, necessary for other reasons, provide a means of avoiding many of the restrictions in an unsatisfactory Table of Organization." The statement "...various mechanisms, necessary for other reasons..." obviously refers to flexible positions and PRA's. The I.G. doesn't question that these mechanisms are necessary although I think it is about time someone did. Flexible positions and PRA's were designed to meet immediate office needs for slotting and merit promotions in the early days of the Agency when it was fast growing and expanding its programs. These mechanisms were supposed to permit staffing and merit promotions until the staffing complement could be adjusted and catch up. But the Agency is long past the period of rapid expansion and

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indeed is retracting somewhat. Major new programs requiring vast numbers of employees are probably a thing of the past. Then why continue using these mechanisms? Precisely because Agency managers find them convenient for subverting things like position classification. These mechanisms just make it a little easier for managers "not to have to manage". The Agency manager does not have to worry about his own office headroom to promote his people - the directorate will come through with headroom or allow PRA's. The Agency manager does not have to ~~pain~~ ^{CAREER} his employees' ~~career~~ to make sure that those who are most deserving get a chance at performing the more challenging and promotable jobs. In short, these mechanisms are a convenient form of ~~springing~~ ~~out~~ ^{springing} ~~copping~~ out from having to be good managers. Responsible and ~~challenging~~ work is not needed to hold onto employees, the manager can just hold the carrot of promotion over their heads.

Finally, no one in PMCD will disagree with the I.G. findings that there is no effective systems of enforcement or appeals. More often than not managers just ignore PMCD position classifications which they do not agree with except if they want a job upgraded. Then they try to find something to trade to make the proposal more palatable. PMCD classifiers have learned that this trade off ~~which~~ while not justification for the upgrading still enables them to get "half a loaf" which is better than getting nothing. The manager has a course of action - no nothing or appeal to D/Pers - while the classifier has no course but reasoning. So recognizing this, the I.G. recommends that the Deputy Directors ~~begin~~ ^{begin} be given classification authority in order to create an avenue of enforcement and appeal. While the I.G. does not know if this will work it feels no harm can be done. I maintain this course of action would quickly end any pretense at grade equity for like work between directorates. Each DD will perceive his jobs differently and similar jobs will begin to range out in grade structure throughout the directorates. The D/Pers

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is suppose to monitor these position classification actions but first he has to determine if it is a "trivial" classification ^{of} problem or one of major proportions. I maintain that a number of "trivial" actions will quickly mount up to become major classification problems. If customer ~~satisf~~ satisfaction is the major reason for the PMCD function, then this course of action will surely obtain that result. One wonders ^{on} what the PMCD classifier will be rated in his fitness report, satisfaction of the directorate with his grade allocations, or adherence to classification principles even if in conflict with the directorates desires.